



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 29, 2021

VIA ECF

Hon. George B. Daniels
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

MAR 30 2021

SO ORDERED

The initial conference is adjourned from
April 21, 2021 to May 12, 2021 at 9:30 a.m.

George B. Daniels
HON. GEORGE B. DANIELS

Re: *Persaud, et al. v. Barr, et al.*, No. 19 Civ. 11275 (GBD)

Dear Judge Daniels:

This Office represents the government in this action in which plaintiffs principally seek review of the denial of an Application for Waiver of Grounds of Inadmissibility (Form I-601) filed with U.S. Citizenship and Immigration Services ("USCIS"). On behalf of the government, I write respectfully to request an on-consent extension of time of fourteen days to respond to the complaint (i.e., from April 5 to April 19, 2021). I also respectfully request that the initial conference presently scheduled for April 21, 2021 be adjourned to the week of May 3, 2021 or thereafter.

The additional time is requested because the parties are continuing to discuss potential resolutions of this action without the need for further judicial intervention and need additional time to do so. This is the government's fifth request for an extension of the deadline to respond to the complaint and to adjourn the initial conference.¹ Plaintiffs' counsel consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

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cc: Counsel of record (via ECF)

¹ The government requested extensions on February 28, 2020 and July 2, 2020 to allow the plaintiff to file another Application to Register Permanent Residence of Adjust Status (Form I-485). See ECF Nos. 17, 19. The government requested an extension on November 2, 2020 to conduct an interview of plaintiff regarding her Form I-485. See ECF No. 22. The government requested an extension on March 2, 2021 to allow the parties to discuss next steps following USCIS's denial of the Form I-485. See ECF No. 25. The Court granted these requests. See ECF Nos. 18, 20, 23, 26.